

May 29, 2019

Federal Communications Commission
Commission's Secretary, Office of the Secretary
445 12th Street, SW
Washington, DC 20554

RE: Draft Declaratory Ruling

Dear Ladies and Gentlemen of the FCC,

I am writing on behalf of Patelco Credit Union, which serves Northern California. We have over 350,000 members and over \$6.9 billion in assets. Patelco Credit Union appreciates the opportunity to provide comments to the Federal Communications Commission (FCC) on the latest rulemaking regarding telephone communication practices.

While we support the efforts to reduce illegal robocalls, we have significant concerns that the action the FCC intends to take is overly broad and could have a significant adverse impact on credit union's ability to communicate with their members.

Credit union members own their credit union. Therefore, they need and expect to receive calls and texts from their credit union. These communications contain critical information, including fraud alerts, account alerts, and collection information among other things. If this order becomes effective, neither the credit union nor credit union members will know when calls are blocked. As a result, consumers may face costly charges in the form of general liability for fraud charges up to \$500 for debit account fraud identified within the first 60 days to the full amount of any fraud identified after, \$50 for each instance of credit-card fraud, plus account overdraft fees or over-the-limit fees based on their credit limits.

Additionally, today, consumers can opt-in to call blocking services. The FCC intends to reverse this practice and allow consumers to opt-out. Part of the justification for the Ruling is consumers were not aware of their right to opt-in and so few did; however, if consumers did not have enough information to know their right to opt-in, it is unlikely they will have enough information to know their right to opt-out.

We are concerned that consumers will have insufficient information regarding the consequences of blocking all calls except those on their personal white list or contacts list. For example, members who applied for loans and need to be called by loan officers may not have those loan officers' numbers stored in their phones. This would effectively block credit union calls from reaching members that have opted-in. It could also complicate credit unions' collection efforts, which could delay borrowers getting critical information and subjecting them to adverse credit reporting.

Therefore, we strongly believe that FCC should do more to distinguish between illegal callers and calls from legitimate businesses with pre-existing relationships. The FCC's order will become effective upon adoption but given these concerns, ***the FCC should take more time to consider stakeholder concerns.***

Thank you for the opportunity to comment on the latest rulemaking and considering our views regarding telephone communication practices.

Sincerely,

Chris Allen
SVP, Chief Risk Officer
Patelco CU

cc: CCUL